

**LUKAS, NACE, GUTIERREZ & SACHS**  
**Chartered**  
**1650 Tysons Boulevard**  
**Suite 1500**  
**McLean, VA 22102**  
**(703) 584-8678**

January 13, 2005

Writer's Direct Dial  
(703) 584-8675

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**RE: Status of the TDD Industry**  
**Ex Parte Presentation**

Dear Ms. Dortch:

On behalf of the TDD Coalition and in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), undersigned who is counsel for ArrayComm, Inc. (a member of the TDD Coalition) submits the instant notice of an *ex parte* presentation.

On January 11, 2005 pursuant to a request from the Commission's staff, members of the TDD Coalition met with officials of the Commission. Representing the Coalition were Joanne Wilson of ArrayComm, Inc. and Leonard Kolsky, regulatory counsel for ArrayComm, Inc. In addition, Brian Kiernen of InterDigital and David Maez, Navini Corporation participated by telephone. The Commission's representatives are listed at the end of this letter and, as indicated, will receive copies of this notice.

The discussion was far-ranging, but major topics included:

- 1) Why has the utilization of TDD technology in the United States lagged behind that of much of the rest of the world?
- 2) How much spectrum is needed for TDD, as a whole and per operator?
- 3) Do the urban and rural uses of TDD require the same technical characteristics or are there differences?
- 4) Has the Coalition identified spectrum in the U.S. that is suitable for TDD?

Marlene H. Dortch, Secretary  
January 13, 2005  
Page 2

5) Must any such spectrum be exclusively for TDD?

It was agreed that the meeting had been useful and should be held on a quarterly basis. The staff asked whether the Coalition could provide a “dream” scenario in terms of amount of spectrum, its location (*i.e.*, above or below a given frequency band), number of licensees and whether spectrum should be auctioned on a national as opposed to a regional basis.

Very truly yours,

/s/

Leonard S. Kolsky

cc: Joel D. Taubenblatt, WTB  
Jennifer B. Tomchin, WTB  
Thomas P. Stanley, WTB  
Peter Corea, WTB  
Mary Woytek, WTB  
John M. Spencer, WTB  
David Hu, WTB  
Peter Trachtenberg, WTB  
Uzoma Onyeije, WTB  
Stephen T. Zak, WTB  
Ira R. Keltz, OET  
Jamison S. Prime, OET  
Priya Shrinivasan, OET  
Shameeka Hunt, OET  
Salomon Satche, OET  
Brian G. Kiernan, InterDigital Communications Corporation  
David Maez, Navini